

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

**UNITED STATES OF AMERICA**

v.

**Hamed Ramadan Bayoumy Aly Marie**

*Defendant.*

**Case No. 1:25-CR-397**

**AFFIDAVIT IN SUPPORT OF APPLICATION  
FOR CRIMINAL COMPLAINT**

I, Kyle Weir, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant charging Hamed Ramadan Bayoumy Aly Marie (“MARIE”) with willfully and maliciously harming a police animal, Customs and Border Protection K9 “Freddy.”
2. I am a Federal Air Marshal (“FAM”) with the Federal Air Marshal Service (“FAMS”) and have been so employed since February 2002. I am currently assigned as a Task Force Officer with Homeland Security Investigations (“HSI”) Washington, D.C. Border Enforcement Security Task Force (“BEST”) and have been so assigned since January 2024. I am an investigative and law enforcement officer of the United States, within the meaning of 18 U.S.C. § 2510(7), and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18 and Title 49 of the United States Code.
3. Based on my training and experience, I am familiar with the elements of assaulting a law enforcement officer and maliciously harming a law enforcement animal.

4. The facts in this affidavit come from my personal observations, training, and experience, my own knowledge of the investigation, information provided to me by other agents or task force officers of BEST, Customs and Border Protection, witness interviews, and other information gathered during the course of this investigation. Because this affidavit is being submitted for the limited purpose of enabling this Court to make a judicial determination of probable cause, I have not included each and every fact known to me concerning this investigation.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that a criminal violation of 18 U.S.C. § 1368(a) (willfully and maliciously harming a police animal), has been committed by MARIE.

#### **PROBABLE CAUSE**

6. BEST and Customs and Border Protection have investigated an incident that took place in the international baggage claim area of Washington Dulles International Airport, which is located within the Eastern District of Virginia.

7. On or about June 24, 2025, at approximately 6:37 a.m., Customs and Border Protection Agricultural Specialist (CBPAS) Snyder and K9 partner, Freddy, were conducting normal roving patrols of the baggage claim area where Egypt Air flight 981's luggage was waiting to be claimed, between baggage claim areas 20 and 21.

8. K9 Freddy was in uniform working in his capacity as a CBP police animal on June 24, 2025. K9 Freddy is an Agricultural K9 Beagle trained to find illicit agricultural contraband that is being brought into the United States. K9 Freddy has worked for CBP for nearly two years.

9. K9 Freddy alerted to a piece of luggage and attempted to inspect the luggage for possible contraband. CBPAS Snyder and K9 Freddy approached the luggage and began to inspect the luggage.

10. The passenger who owned the luggage, and was later identified as MARIE by his passport and visa, approached CBPAS Snyder and K9 Freddy and began to speak with them. Shortly after the conversation began, MARIE kicked K9 Freddy. K9 Freddy was kicked so hard that he was lifted off of the ground. K9 Freddy was injured and was taken to the veterinary emergency room. Still shots from the CCTV footage of K9 Freddy directly after the kick are included below.



## CONCLUSION

11. Based on the foregoing, I submit that there is probable cause to believe that Hamed Ramadan Bayoumy Aly MARIE did violate 18 U.S. Code § 1368 by willfully and maliciously kicking K9 Freddy, a police animal, while K9 Freddy was carrying out his duties serving a Federal agency.

Respectfully submitted,



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Task Force Officer / Federal Air Marshal  
Kyle Weir  
Homeland Security Investigations

Attested to by the applicant in accordance  
with the requirements of Fed. R. Crim. P. 4.1  
by telephone on June 24, 2025.



United States Magistrate Judge  
William E. Fitzpatrick